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9 **UNITED STATES DISTRICT COURT**  
10  
11 **DISTRICT OF NEVADA**

11 ISABEL IBARRA, 12 Plaintiff, 13 vs. 14 CENTURY SECURITY MANAGEMENT 15 OF LAS VEGAS CORP., a Nevada Domestic 16 Corporation; DOES 1 through 10; and ROE 17 BUSINESS ENTITIES 1 through 10, inclusive, 18 Defendants.	CASE NO.: 2:18-cv-01706-MMD-VCF  <b>NOTICE OF SETTLEMENT AND STIPULATION AND ORDER TO STAY</b> <b>(first request)</b>
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19 Plaintiff, ISABEL IBARRA (“Plaintiff”) and Defendant, CENTURY SECURITY  
20 MANAGEMENT OF LAS VEGAS CORP (“Defendant”), by and through their respective  
21 counsel, respectfully advise this court that a settlement has been reached among the parties  
22 during private mediation.

23 WHEREFORE, the parties agree and stipulate as follows:

24 1. The current deadline to file the Pre-Trial Memorandum is currently today, **May**  
25 **17, 2021.**

26 2. Finalizing the settlement has taken much longer than anticipated due to  
27 accounting resolution and other confidential matters, but the parties believe in good faith that the

settlement should be fully complete within fourteen (14) days.

3. Thus, the parties are seeking a stay of this matter for fourteen (14) days in which to complete the settlement and fully expect that prior to the expiration of that time the parties anticipate filing a stipulation and order dismissing this matter.

4. Thus this matter should be stayed until Monday, May 31, 2021. But because of the date falling on a Court Holiday (Memorial Day) the new date should be **June 1, 2021**.

5. Should the settlement not be concluded during that time, the Plaintiff reserves the right to seek assistance from the Court to enforce the agreement of the parties.

IT IS SO STIPULATED.

Dated this 17<sup>th</sup> day of May, 2021  
KEMP & KEMP

By: /s/ James P. Kemp  
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Dated this 17<sup>th</sup> day of May, 2021  
LIPSON NEILSON P.C.

By: /s/ Lisa J. Zastrow  
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Corp.*

## **Ibarra v. Century Security Management of Las Vegas**

**Case No. 2:18-cv-01706-MMD-VCF**

## ORDER

Based on the foregoing stipulation, and good cause appearing therefore,

IT IS SO ORDERED.

DATED: 5-17-2021

UNITED STATES MAGISTRATE JUDGE